

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

**RAYMOND DORICCHI,**

**Plaintiff,**

**vs.**

**GREENVILLE COUNTY SHERIFF'S  
DEPARTMENT, and JEREMY JONES,  
Both In His Official Capacity As A Deputy  
With Greenville County Sheriff's  
Department, And Individually;**

**Defendants.**

**C/A No.: 6:17-01636-TMC**

**PLAINTIFF'S RULE 26(A)(3)  
PRETRIAL DISCLOSURES**

In accordance with Rule 26(a)(3) of the Federal Rules of Civil Procedure, Plaintiff hereby submits the following Pretrial Disclosures:

- (i) The name and, if not previously provided, the address and telephone number of each witness – separately identifying those the party expects to present and those it may call if the need arises:**

Plaintiff expects to present the following witnesses:

- a. Raymond Doricchi, Bell Legal Group, 219 Ridge Street, Georgetown, SC 29446, 843-546-2408.
- b. Jeremy Jones, Willson, Jones, Carter & Baxley, 872 Pleasantburg Drive, Greenville, SC 29607, 864-672-3711.
- c. Thomas Gowens, 200 Mush Creek Road, Travelers Rest, SC 29690. Phone number unknown.
- d. Michael Johnson, 5685 Locust Hill Road, Travelers Rest, SC 29690. Phone number unknown.
- e. Greenville Health Systems records custodian, 701 Grove Road, Greenville, SC, 864-455-9980.
- f. Greenville Sheriff's Department records custodian, 4 McGee Street, Greenville, SC, 864-271-5210.

- (ii) **The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition:**

At this time, the Plaintiff does not intend to offer any testimony via deposition but reserves the right to designate testimony in reply if needed.

- (iii) **An identification of each document or other exhibit, including summaries of other evidence – separately identifying those items the party expects to offer and those it may offer if the need arises:**

Plaintiff intends to offer the following exhibits:

- a. Greenville County Sheriff's Office Incident Report – May 9, 2015 (GCSO – LS170010 (Doricchi) 000028)
- b. Greenville County Sheriff's Office Supplemental Report (GCSO – LS170010 (Doricchi) 000029-000033)
- c. Response to Resistance/Aggression Review/Analysis (GCSO – LS170010 (Doricchi) 000026-000027)
- d. Greenville Health System Medical Record (Greenville Memorial 0013-0020)
- e. Jeremy Jones Office of Police Standards File (JONES 000903-002961)
- f. Thomas Gowens Affidavit

Plaintiff may offer the following exhibits:

- a. Greenville County Sheriff's Office General Orders "Employee Assessment System" (GCSO – LS170010 (Doricchi) 000097-000100)
- b. Greenville County Sheriff's Office General Orders "Response to Resistance/Aggression" (GCSO – LS170010 (Doricchi) 000101-000113)
- c. Greenville County Sheriff's Office General Orders "Criminal Process/Arrest" (GCSO – LS170010 (Doricchi) 000114-000130)

**[SIGNATURE BLOCK ON FOLLOWING PAGE]**

**BELL LEGAL GROUP, LLC**

s/J. Edward Bell, III  
J. Edward Bell, III, Fed ID 1280  
Victoria Knight  
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**ATTORNEYS FOR THE PLAINTIFFS**

February 17, 2020  
Georgetown, SC